



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Alfred, Director

May 15, 2001

CERTIFIED MAIL # 7099 3220 0006 2682 1467

Mr. Jeff Abbott
Plant Manager
Bennett Lumber Products, Inc.
P.O. Box 49
Princeton, Idaho 83857

RE: Project No. 9501-013-1, Bennett Lumber Products, Inc., Princeton
(Final Tier I Operating Permit No. 057-00008)

Dear Mr. Abbott:

The Idaho Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit Number 059-00008 for Bennett Lumber Products, Inc. in accordance with Title V of the Clean Air Act and the *Rules for the Control of Air Pollution in Idaho (Rules)*, IDAPA 58.01.01.300 through 386. This operating permit, which is effective immediately, summarizes the applicable requirements for your facility and requires an annual compliance certification for all emissions units.

The enclosed operating permit is based on the information contained in your permit application, received December 14, 1995. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the *Rules*.

You are strongly encouraged to attend a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Eric Kopczynski of the Lewiston Regional Office will contact you regarding this meeting. DEQ strongly recommends that the plant manager, as well as the responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions attend the meeting.

You, as well as any other entity, have the right to appeal this final agency action pursuant to Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "*Rules Governing Contested Case Proceedings and Declaratory Rulings*," by filing a petition with the Hearings Coordinator, DEQ, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. Also, in accordance with IDAPA 58.01.01.366.04.a, any person may petition the U.S. Environmental Protection Agency (EPA) to object to this permit within 60 days after the expiration of EPA's 45-day review period. However, we encourage you to contact Marjorie MartzEmerson at (208) 373-0502 to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Eric Kopczynski at (208) 799-4270 or Marjorie MartzEmerson at (208) 373-0502.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KBK/REB:bm:mme:ms

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Enclosure

cc: Bob Baldwin, Technical Services
Eric Kopczynski, Lewiston Regional Office
Gary Reinbold, Air Quality Division
Marilyn Seymore, Air Quality Division

Carole Zundel, Technical Services
Laurie Kral, EPA Region 10
Source File (057-00008)
COF



**Air Pollution
TIER I OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 057-00008

AQCR: 62

CLASS: A

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 517.4, 5195.7

1. PERMITTEE

Bennett Lumber Products, Incorporated

2. PROJECT

Tier 1 Operating Permit

3. MAILING ADDRESS

P.O. Box 49

CITY

Princeton

STATE

Idaho

ZIP

83857

4. FACILITY CONTACT

Jeff Abbott

TITLE

Engineering

TELEPHONE

(208) 875-1121 ext.

5. RESPONSIBLE OFFICIAL

Frank R. Bennett

TITLE

Plant Manager

TELEPHONE

(208) 875-1121 ext.

6. EXACT PLANT LOCATION

Idaho Highway 6; 3 miles east of Princeton

COUNTY

Latah

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Lumber, Wood Chips, Hog Fuel, and Wood Shavings

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.


STATE AIR QUALITY PROGRAM ADMINISTRATOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: May 15, 2001

DATE EXPIRES: May 15, 2005

RECEIVED

JUN - 7 2001

DEPT. OF ENVIRONMENTAL QUALITY
TECHNICAL SERVICES OFFICE

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AIR QUALITY TIER I OPERATING PERMIT NUMBER: 057-00008

PERMITTEE: BENNETT LUMBER PRODUCTS, INC.
LOCATION: PRINCETON, IDAHO

DATE ISSUED: MAY 15, 2001
DATE EXPIRES: MAY 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Facility-wide Conditions**1. FACILITY-WIDE CONDITIONS**

The following table contains a summary of requirements that apply generally to emissions units at the facility:

Table 1.1

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
1.1	Fugitive Dust	Reasonable Control	IDAPA 58.01.01.651	1.2, 1.3, 1.4, 1.9
1.5	Odors	Reasonable Control	IDAPA 58.01.01.776.01	1.6, 1.11
1.7	Opacity	Twenty percent (20%) for more than three (3) minutes in any sixty (60) minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess Emissions	In compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9
1.10	Reports & Certification	In compliance with IDAPA 58.01.01.322	IDAPA 58.01.01.322	1.10
1.12	Open Burning	In compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600.616	1.12
1.13	Renovation or Demolition	In compliance with 40 CFR 61, Subpart M	40 CFR, Subpart M	1.13
1.14	Risk Management	In compliance with IDAPA 58.01.01.322 and 40 CFR 68	IDAPA 58.01.01.322 40 CFR 68	1.14

Fugitive Emissions

- 1.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 5/1/94]
- 1.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, .07, 5/1/94]
- 1.3 Unless specified elsewhere in this permit, the permittee shall maintain a record of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The record shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, .07, 5/1/94]
- 1.4 Unless specified elsewhere in this permit, the permittee shall conduct a monthly facility-wide fugitive emission inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain a record of the results of each monthly fugitive emission inspection. The record shall, at

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Facility-wide Conditions

a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, .07, .08, 5/1/94]

Odors

- 1.5. No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94 (Federally enforceable; however, this provision will become state-only enforceable upon removal from the State Implementation Plan (SIP))]

- 1.6. Unless specified elsewhere in this permit, the permittee shall maintain a record of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The record shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, .07 (state-only), 5/1/94]

Visible Emissions

- 1.7. No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

- 1.8. Unless specified elsewhere in this permit, the permittee shall conduct a monthly facility-wide visible emissions inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emission, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than twenty percent (20%) for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain a record of the results of each monthly visible emission inspection. The record shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, .07, .08, 5/1/94]

Excess Emissions

- 1.9. Unless specified elsewhere in this permit, the permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 130-136 shall govern in the event of conflicts between the subsections of 1.9. and the regulations of IDAPA 130-136.
- 1.9.1. The person responsible for, or in charge of a facility during, an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ submit a full report of such

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LOCATION: PRINCETON, IDAHO

DATE ISSUED: MAY 15, 2001
DATE EXPIRES: MAY 15, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Facility-wide Conditions

occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

- 1.9.2. In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with Sections 133.01(a) through (d), including, but not limited to:

[IDAPA 58.01.01.133, 4/5/00]

- 1.9.2.1 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by DEQ; and

[IDAPA 58.01.01.133.01.a, 3/20/97]

- 1.9.2.2 Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two (2) hours prior to the start of the excess emission event unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- 1.9.2.3 The owner or operator of a source of excess emissions shall report and record the information required pursuant to Sections 1.9.4 and 1.9.5 of this permit and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

- 1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with Sections 134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

- 1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- 1.9.3.1.1 The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- 1.9.3.1.2 The owner or operator shall notify DEQ of any upset/breakdown/safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than twenty-four (24) hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- 1.9.3.1.3 The owner or operator shall report and record the information required pursuant to Sections 1.9.4 and 1.9.5 of this permit and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

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Facility-wide Conditions

- 1.9.3.2. During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in Section 134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

- 1.9.4. A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than fifteen (15) days after the beginning of each such event. Each report shall contain the information specified in Section 135.02.

[IDAPA 58.01.01.135.01, .02, .03, 3/20/97]

- 1.9.5. The owner or operator shall maintain excess emissions records at the facility for the most recent five (5) calendar year period. The excess emissions records shall be made available to DEQ upon request. The excess emissions records shall include the information requested by Section 136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, .02, .03, 3/20/97]

- 1.9.5.1. An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- 1.9.5.2. Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/ safety preventative maintenance plans which have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

[IDAPA 58.01.01.130-136, 4/5/00 (state-only; however, this provision will become federally enforceable upon EPA approval into the SIP), .322.08.b, 3/23/98]

Reports and Certifications

- 1.10 All periodic reports and certifications required by this permit shall be submitted to the DEQ within thirty (30) days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 "F" St.
Lewiston, ID 83501

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Facility-wide Conditions

The periodic compliance certification required by General Provision 21 shall also be submitted within thirty (30) days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[IDAPA 58.01.01.322.08,.11, 5/1/94]

Monitoring and Recordkeeping

- 1.11. The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the dates, places, and times of sampling or measurements; (b) the dates analyses were performed; (c) the companies or entities that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available to DEQ representatives upon request in either hard copy or electronic format.

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

- 1.12. The facility shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Renovation/Demolition

- 1.13. The permittee shall comply with all applicable portions of 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61 Subpart M]

Regulated Substances for Accidental Release Prevention

- 1.14. An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR Part 68 no later than the latest of the following dates:

Three (3) years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130; or

The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

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Facility-wide Conditions**Test Methods**

1.15. If testing is required, the permittee shall use the following test methods to measure the pollutant emissions:

Pollutant	Test Method	Special Conditions
Particulate Matter of 10 microns or less (PM ₁₀)	EPA Method 201A*	
Particulate Matter (PM)	EPA Method 5*	
Carbon Monoxide (CO)	EPA Method 10*	
Volatile Organic Compounds (VOC)	EPA Method 25*	
Opacity	EPA Method 9*	If New Source Performance Standards (NSPS) source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or a DEQ-approved alternative in accordance with IDAPA 58.01.01.157

Compliance Testing

1.16. If testing is required, the permittee shall provide notice of intent to test to the DEQ at least fifteen (15) days prior to the scheduled test. This time period may be shortened with DEQ approval, or if allowed in a permit, order, or consent decree. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is strongly encouraged to submit in writing to DEQ, at least thirty (30) days in advance, the following for approval:

- ▶ The type of method to be used,
- ▶ Any extenuating or unusual circumstances regarding the proposed test, and
- ▶ The proposed schedule for conducting and reporting the test.

Within thirty (30) days following the date in which a compliance test required by this permit is concluded, the permittee shall submit to DEQ a compliance test report for the test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

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Facility-wide Conditions

The proposed test date(s), test date rescheduling notice(s), compliance test reports, and all other correspondence shall be sent to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 F St.
Lewiston, ID 83501
(208) 799-4370 Fax: (208) 779-3451

[IDAPA 58.01.01.157,4/5/00; 322.06, .08.a, .09, 5/1/94]

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Emissions Unit Group 1: Hog Fuel Boiler**2. EMISSIONS UNIT GROUP 1 - ZURN INDUSTRIES HOG FUEL BOILER**

Table 2.1 below describes the control devices used in controlling emissions from the sources regulated in this permit:

Table 2.1

Emissions Unit(s)/ Process(es)	Emission Control Device
Hog Fuel Boiler	Multi-clone, Scrubber

Table 2.2 contains only a summary of requirements that apply to the hog fuel boiler. Specific permit requirements are listed below.

Table 2.2

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	PM	0.200 gr/dscf @ 8% O ₂	IDAPA 58.01.01.677	2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.12, 2.13
2.2	Opacity	Twenty percent (20%) for more than three (3) minutes in any sixty (60) minute period.	IDAPA 58.01.01.625	2.9, 2.11, 2.12, 2.13
2.3	Steam Production Rate	120% of the steam production rate measured in the most recent performance test.	IDAPA 58.01.01.322.01	2.10

- 2.1. A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than ten million (10,000,000) BTUs per hour, particulate matter in excess of the concentrations shown in table 2.3.

Table 2.3

Fuel type	Allowable particulate emissions	Percent oxygen
Wood	0.200 gr/dscf	8%

The effluent gas shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677, 5/1/94]

- 2.2. A person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

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Emissions Unit Group 1: Hog Fuel Boiler

- 2.3. The operational steaming rate shall be maintained at or below one hundred twenty percent (120%) of the average steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with Section 2.1 of this permit. If a maximum operational steaming rate of one hundred twenty percent (120%) of the average steaming rate attained during the most recent performance test would exceed the emission limit in Section 2.1, the maximum operational steaming rate shall be limited to the steaming rate obtained by the following equation:

$$\text{Max. steam rate} = \text{Ave. steam rate during test} \times \left(\frac{0.20 \text{ gr/dscf @ 8\% Oxygen}}{\text{tested grain loading @ 8\% Oxygen}} \right)$$

The permittee may conduct additional performance tests during the permit term to revise the allowable steaming rate so long as the performance tests conform to all requirements of this permit. Whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time, but no longer than twenty-four (24) hours from the discovery of the exceedance, to bring the steaming rate to the allowable rate or below. Deviations from this allowable operating rate shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. The DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.

[IDAPA 58.01.01.322.01, 3/19/99]

- 2.4. While combusting wood products, the permittee shall conduct a particulate matter performance test at maximum operating capacity in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5; or a DEQ alternative method, as provided in Section 1.15 of this permit, while combusting hog fuel. The test shall be performed during the first three (3) months of the permit term to demonstrate compliance with the grain-loading standard in Section 2.1 of this permit and with IDAPA 58.01.01.677.

The permittee shall monitor and record the steam production rate of the boiler during each test. A visible emissions evaluation shall be performed during each performance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.

If the particulate grain loading measured in the initial performance test is less than or equal to seventy-five percent (75%) of the emission standard in IDAPA 58.01.01.677, no further testing shall be required during the life of the permit. If the particulate grain loading measured during the performance test is greater than seventy-five percent (75%), but less than or equal to ninety percent (90%) of the emission standard in IDAPA 58.01.01.677, a second test shall be required in the third year of the permit term. If the particulate grain loading measured during the performance test is greater than ninety percent (90%) of the emission standard in IDAPA 58.01.01.677, the permittee shall conduct a performance test annually.

Operational parameters for the Zurn Industries hog fuel boiler multi-clone and wet scrubber shall be taken from pressure drop readings of the most recent performance test that demonstrates compliance with the particulate matter emissions limit of Section 2.1 of this permit. Operational parameters may be altered according to the pressure drop readings gained during subsequent performance tests.

The permittee shall submit a performance test Protocol to DEQ within thirty (30) days of conducting any performance test required by this permit as specified in Section 1.16 of this permit. The performance test protocol shall address the required averaging period specified in IDAPA 58.01.01.679, the altitude correction in

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Emissions Unit Group 1: Hog Fuel Boiler

IDAPA 58.01.01.680, and the multi-clone pressure drop and process weight monitoring procedures to be recorded during the duration of the performance test.

[IDAPA 58.01.01.322.06(c),(d), 09, 5/1/94]

- 2.5. The permittee shall submit a performance test report to DEQ as specified in Section 1.16 of this permit.
[IDAPA 58.01.01.322.08(a), 5/1/94]
- 2.6. The pressure drop across the multi-clone shall be maintained at a level between twenty percent (20%) above or twenty percent (20%) below the average pressure drop recorded during the most recent performance test conducted pursuant to this permit which demonstrates compliance with Section 2.1 of this permit. The permittee may conduct additional performance tests during the permit term to revise the allowable pressure drop so long as the performance tests conform to all the requirements of this permit. Whenever the pressure drop across the multi-clone is outside the allowable range, the permittee shall take corrective action within a reasonable time, but no longer than twenty-four (24) hours from discovery of the deviation, to bring the pressure drop back within the allowable range. Deviations from this allowable operating range shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.
[IDAPA 58.01.01.322.06(d), 5/1/94]
- 2.7. The pressure drop across the wet scrubber shall be maintained at a level between twenty percent (20%) above or twenty percent (20%) below the average pressure drop recorded during the most recent performance test conducted pursuant to this permit which demonstrates compliance with Section 2.1 of this permit. The permittee may conduct additional performance tests during the permit term to revise the allowable pressure drop so long as the performance tests conform to all the requirements of this permit. Whenever the pressure drop across the wet scrubber is outside the allowable range, the permittee shall take corrective action within a reasonable time, but no longer than twenty-four (24) hours from discovery of the deviation, to bring the pressure drop back within the allowable range. Deviations from this allowable operating range shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.
[IDAPA 58.01.01.322.06(d), 5/1/94]
- 2.8. The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the pressure drop across the Zurn Industries hog fuel boiler multi-clone and wet scrubber during operation of the hog fuel boiler.
[IDAPA 58.01.01.322.06(d), 5/1/94]
- 2.9. The permittee shall monitor and record the pressure drop readings across the Zurn Industries hog fuel boiler multi-clone and wet scrubber daily. In the event the pressure drop measurement device becomes inoperable, the DEQ shall be notified within twenty-four (24) hours and a timeline shall be established for repair or replacement of the monitoring device.
[IDAPA 58.01.01.322.06(d), 07, 5/1/94]
- 2.10. The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the steam production rate of the Zurn Industries hog fuel boiler. The average hourly steaming rate shall be recorded at least once per day. The records shall be maintained in accordance with Section 1.11 of this permit. If the continuous steaming rate measurement system becomes inoperable, a backup monitoring method consisting of manual hourly readings or calculations shall be implemented within ninety-six (96) hours of the continuous steaming rate measurement system becoming inoperable, and shall be used until the original system is operational.
[IDAPA 58.01.01.322.06(c), (d), 5/1/94]

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Emissions Unit Group 1: Hog Fuel Boiler

- 2.11. The permittee shall conduct weekly visible emissions evaluations in accordance with the procedures contained in IDAPA 58.01.01.625. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Section 1.11 of this permit.

During a month that a performance test required by Section 2.4 is scheduled, the weekly visible emissions evaluation shall be performed during the performance test. Results of the visible emissions evaluation shall be submitted with the performance test report.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.12. The Zurn Industries hog fuel boiler shall be fueled exclusively by wood products.

[IDAPA 58.01.01.322.01, 3/19/99]

- 2.13. An Operation and Maintenance (O&M) Manual shall be developed and followed by the permittee and submitted to DEQ for approval within sixty (60) days of issuance of this permit. The O&M Manual shall address the operation, maintenance, and repair of both the hog fuel boiler's multi-clone and wet scrubber. The O&M Manual shall be updated as necessary and at a minimum include the most recent general descriptions of the equipment; the normal operational ranges of the pressure drops for the multi-clone and wet scrubber; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

[IDAPA 58.01.01.322.06(d), 5/1/94(state only)]

- 2.14. The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the hog fuel boiler multi-clone and scrubber listed in this permit.

[IDAPA 58.01.01.322.01, 3/19/99 (state only)]

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*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***Emissions Unit Group 2 - Drying Kilns****3. EMISSIONS UNIT GROUP 2 - DRYING KILNS**

Emissions Unit Group 2 consists of six drying kilns.

Table 3.1 below describes the control devices used in controlling emissions from the sources regulated in this permit. The process-weight-rate limitation is applied to the entirety of Emissions Unit Group 2.

Table 3.1

Emission Point Identification	Emissions Unit(s)/Process(es)	Emission Control Device
P15, P16, P17, P18, P19, P20	Drying Kilns #1, #2, #3, #4, #5, and #6	None

Table 3.2 contains a summary of requirements that apply generally to the facility. Specific permit requirements are listed below:

Table 3.2

Permit Conditions	Source ID	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
3.1	P15, P16, P18, P19	PM	Process Weight Rate	IDAPA 58.01.01.702	3.6, 3.7
3.2	P17, P20	PM	Process Weight Rate	IDAPA 58.01.01.701	3.6, 3.7
3.3	P15, P16, P17, P18, P19, P20	Opacity	Twenty percent (20%) for more than three (3) minutes in any sixty (60) minute period.	IDAPA 58.01.01.625	3.4, 3.5

- 3.1. A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

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Emissions Unit Group 2 - Drying Kilns

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 3.2. A person shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

- 3.3. A person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

- 3.4. The permittee shall conduct weekly observances of visible emissions from the drying kilns during daylight hours under normal operating conditions. If visible emissions from the drying kilns are present, the permittee shall take corrective action in accordance with the drying kiln O&M Manual. The drying kiln O&M Manual shall be submitted to DEQ for approval within sixty (60) days of issuance of this permit and shall include, at a minimum, a general description of the kilns; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

- 3.4.1. The results of each observation shall be recorded and maintained as required in Section 1.8 of this permit, and shall include but not limited to the following information:

Date of observation,
Time of observation,
Equipment/emission point observed,
Weather conditions during observation, and
Presence of any visible emission - yes or no.

- 3.4.2. If visible emissions are present, the permittee shall within twenty-four (24) hours follow the procedures specified in the O&M Manual. The permittee shall record if any corrective action is necessary, and if so, what corrective action was taken.

[IDAPA 58.01.01.322.06.c, 5/1/94]

- 3.5. The permittee shall conduct weekly visible emissions evaluations of the drying kilns to determine compliance with Section 3.3 of this permit in accordance with the methods and procedures contained in IDAPA 58.01.01.625. The

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Emissions Unit Group 2 - Drying Kilns

visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Section 1.11 of this permit.

At the end of a six-week period of weekly monitoring, if the opacity has consistently been zero percent (0%), the permittee may begin monthly monitoring with DEQ's approval. At the end of a six month period of monthly monitoring, if the opacity has consistently been zero percent (0%), the permittee may begin quarterly monitoring with DEQ's approval. If at any time there are visible emissions observed, then the baseline would be reset (i.e., inspections would revert to weekly until six consecutive weeks of acceptable observations were recorded).

[IDAPA 58.01.01.322.06(c), 5/1/94]

- 3.6. The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the drying kilns referred to in this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

- 3.7. The permittee shall maintain records containing the monthly throughput, the calculated process weight rate limitations using the appropriate formula from section(s) 3.1 and/or 3.2 for each of the process equipment affected by the process weight rule, and the monthly hours of operation for each of the process equipment. These records shall be maintained in accordance with Section 1.11 of this permit.

[IDAPA 58.01.01.322.06, 5/1/94]

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*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***Emissions Unit Group 3: Cyclones, Baghouse Cyclone, and Baghouse****4. EMISSIONS UNIT GROUP 3 - CYCLONES, BAGHOUSE CYCLONE, AND BAGHOUSE**

Emissions Unit Group 3 consists of several cyclones, a baghouse cyclone and a baghouse.

Table 4.1 below describes the control devices used in controlling emissions from the sources regulated in this permit:

Table 4.1

Emission Point Identification	Emissions Unit(s)/ Process(es)	Emission Control Device
P6	Baghouse Cyclone	None
P7	Sawdust Cyclone	None
P11	Shavings Cyclone	None
P12	Shavings Cyclone	None
P13	Shavings Cyclone	None
P14	Shavings Cyclone	None
P21	Sawdust Cyclone	None
P24	Baghouse	None

The following table contains a partial summary of requirements that apply generally to the cyclones, baghouse cyclone, and baghouse. Specific permit requirements are listed below:

Table 4.2

Permit Conditions	Source ID	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
4.1	P7, P11, P12, P13, P14, P21	PM	Process Weight Rate	IDAPA 58.01.01.702	4.6, 4.7
4.2	P6, P24	PM	Process Weight Rate	IDAPA 58.01.01.701	4.6, 4.7
4.3	P6, P7, P11, P12, P13, P14, P21, P24	Opacity	Twenty percent (20%) for more than three (3) minutes in any sixty (60) minute period.	IDAPA 58.01.01.625	4.4, 4.5

- 4.1. A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

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Emissions Unit Group 3: Cyclones, Baghouse Cyclone, and Baghouse

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 4.2. A person shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

- 4.3. A person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

- 4.4. The permittee shall conduct weekly observances of visible emissions from the cyclones and baghouses during daylight hours under normal operating conditions. If visible emissions from the cyclones and baghouses are present, the permittee shall take corrective action in accordance with the cyclones and baghouses O&M Manual. The cyclones and baghouses O&M Manual shall be submitted to DEQ for approval within sixty (60) days of issuance of this permit and shall include, at a minimum, a general description of the equipment; normal operating conditions and procedures of the equipment; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

- 4.4.1. The results of each observation shall be recorded and maintained as required in Section 1.8 of this permit, and shall include, but not be limited to, the following information:

Date of observation,
Time of observation,
Equipment/emission point observed,
Weather conditions during observation, and
Presence of any visible emission - yes or no.

- 4.4.2. If visible emissions are present, the permittee shall within twenty-four (24) hours follow the procedures specified in the O&M Manual. The permittee shall record if any corrective action is necessary, and if so, what corrective action was taken.

[IDAPA 58.01.01.322.06.c, 5/1/94]

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Emissions Unit Group 3: Cyclones, Baghouse Cyclone, and Baghouse

- 4.5. The permittee shall conduct weekly visible emissions evaluations on the cyclones, stacks, and baghouse stack to determine compliance with Section 4.3 of this permit in accordance with the methods and procedures contained in IDAPA 58.01.01.625. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded which shall be maintained in accordance with Section 1.11 of this permit.

At the end of a six-week period of weekly monitoring using IDAPA 58.01.01.625, if the opacity has consistently been zero percent (0%), the permittee may begin monthly monitoring with DEQ's approval. At the end of a six-month period of monthly monitoring using IDAPA 58.01.01.625, if the opacity has consistently been zero percent (0%), the permittee may begin quarterly monitoring with DEQ's approval. If at any time there are visible emissions observed, then the baseline would be reset (i.e., inspections would revert to weekly until six consecutive weeks of acceptable observations were recorded).

[IDAPA 58.01.01.322.06, 5/1/94]

- 4.6. The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the cyclones, cyclone baghouse, and baghouse listed in this permit.

[IDAPA 58.01.01.322.01, 3/19/99(state-only)]

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*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***Emissions Unit Group 4 - Wood By-product Handling****5. EMISSIONS UNIT GROUP 4 – WOOD BY-PRODUCT HANDLING**

The sources in Emissions Unit Group 4 can contribute to particulate emissions from the handling of wood and wood by-products or through general plant activities. These emissions units do not vent through stacks or have any pollution control equipment attached.

Emissions unit group 4 is bins that unload wood by-product into trucks.

Table 5.1

Emission Point Identification	Emissions Unit(s)/ Process(es)	Emission Control Device
TR13	Bark Bin to Truck	None
TR14	Sawdust Bin to Truck	None
TR15	Chip Bin to Truck	None
TR16	Shavings Bin to Truck	None

The following table contains a partial summary of requirements that apply generally to bins. Specific permit requirements are listed below:

Table 5.2

Permit Conditions	Source ID	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
5.1	TR 13	PM	Process Weight Rate	IDAPA 58.01.01.701	5.4, 5.5, 5.7
5.2	TR14, TR15, TR16	PM	Process Weight Rate	IDAPA 58.01.01.702	5.4, 5.5, 5.7
5.3	TR13, TR14, TR15, TR16	Fugitive	Reasonable Control	IDAPA 58.01.01.651	5.4

- 5.1. A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

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Emissions Unit Group 4 - Wood By-product Handling

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 5.2. A person shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.702, 4/5/00]

- 5.3. Unless specified elsewhere in this permit, the permittee shall conduct a monthly fugitive emission inspection of fugitive emission sources, during daylight hours, during truck bin loadouts, and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall, at a minimum, include the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date of the corrective action was taken.

[IDAPA 58.01.01.322.06, .07, 5/1/94]

- 5.4. The permittee shall conduct weekly observances of visible emissions from the wood by-product handling equipment during daylight hours under normal operating conditions. If visible emissions from the wood by-product handling equipment are present, the permittee shall take corrective action in accordance with the wood by-product handling equipment O&M Manual. The wood by-product handling equipment O&M Manual shall be submitted to DEQ for approval within sixty (60) days of issuance of this permit and shall include, at a minimum, a general description; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions guidelines of the wood by-product handling equipment; and corrective action procedures.

- 5.4.1. The results of each observation shall be recorded and maintained as required in Section 1.8 of this permit, and shall include, but not be limited to, the following information:

Date of observation,
Time of observation,
Equipment/emission point observed,
Weather conditions during observation, and
Presence of any visible emission - yes or no.

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Emissions Unit Group 4 - Wood By-product Handling

- 5.4.2. If visible emissions are present, the permittee shall within 24 hours follow the procedures specified in the O&M Manual. The permittee shall record if any corrective action is necessary, and if so, what corrective action was taken.
[IDAPA 58.01.01.322.06.c, 5/1/94]
- 5.5. The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the wood by-product handling equipment listed in this permit.
[IDAPA 58.01.01.322.01, 5/1/94(state-only)]
- 5.6. The permittee shall maintain records containing the monthly throughput, the calculated process weight rate limitations using the appropriate formula within section(s) 5.1 and/or 5.2 on each of the process equipment affected by the process weight rate rule, and the hours of operation for each of the process equipment each month. These records shall be maintained in accordance with Section 1.11 of this permit.
[IDAPA 58.01.01.322.06, 5/1/94]

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Emissions Unit Group 5 - Emergency Generator**6. EMISSIONS UNIT GROUP 5 - EMERGENCY GENERATOR**

The following table contains a partial summary of requirements that apply to the Emergency Generator. Specific permit requirements are listed below:

Emission unit 5 is a generator that is started for very short periods throughout the year.

Table 6.1

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring & Recordkeeping Requirements
6.1	Sulfur Content	0.3 Weight % Sulfur - Distillate Fuel Grade #1 0.5 Weight % Sulfur - Distillate Fuel Grade #2	IDAPA 58.01.01.728	6.3
6.2	Opacity	Twenty percent 20% for more than three (3) minutes in any sixty (60) minute period.	IDAPA 58.01.01.625	6.4

- 6.1. No person shall sell, distribute, use, or make available for use, any distillate fuel oil containing more than the following percentages of sulfur:

ASTM Grade 1 fuel oil - 0.3 percent by weight.
ASTM Grade 2 fuel oil - 0.5 percent by weight.

[IDAPA 58.01.01.728, 5/1/94]

- 6.2. A person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

- 6.3. The permittee shall obtain documentation of fuel sulfur content from each fuel supplier for its supply of fuel at least annually. If there is a change of fuel sulfur content, the permittee shall obtain appropriate documentation from the supplier. The permittee shall keep documentation in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06.c, 5/1/94]

- 6.4. The permittee shall conduct visible emissions evaluations on the emergency generator stack every time the emergency generator is fired up and the engine has warmed up. The permittee shall conduct at the minimum a quarterly visible emissions evaluation to determine compliance with Section 6.2 of this permit, in accordance with the methods and procedures contained in IDAPA 58.01.01.625. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Section 1.11 of this permit.

[IDAPA 58.01.01.322.06.c, 5/1/94]

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DATE EXPIRES: MAY 15, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***Emissions Unit Group 5 - Emergency Generator**

- 6.5. A person shall not discharge to the atmosphere from any fuel-burning equipment with a maximum rated input of ten (10) million BTUs per hour or more, and commencing operation on or after October 1, 1979, particulate matter in excess of the concentrations shown in the following table:

Fuel Type	ALLOWABLE Particulate gr/dscf	EMISSIONS Oxygen
Liquid	.050	3%

The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.676, 5/1/94]

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PERMITTEE: BENNETT LUMBER PRODUCTS, INC.
 LOCATION: PRINCETON, IDAHO

DATE ISSUED: MAY 15, 2001
 DATE EXPIRES: MAY 15, 2005

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Emissions Unit Group 6 - Insignificant Activities**7. EMISSIONS UNIT GROUP 6 - INSIGNIFICANT ACTIVITIES**

Activities and emissions units identified as insignificant under IDAPA 58.01.01.317.01(b) are required to be listed in the Tier I Operating Permit to qualify for a permit shield.

Emissions Unit	Description	Insignificant Activities IDAPA Citation Section 317.01(b)(I)
ST1	Truck Bark Bin	30
ST2	Truck Sawdust Bin	30
ST3	Truck Chip Bin	30
ST4	Boiler Fuel Storage	30
ST5	Auxiliary Fuel Bin	30
ST6	Shavings Truck Bin	30
ST7	Log Yard Waste 1	30
ST8	Rock Storage	30
ST9	Log Yard Waste 2	30
ST10	Ash Storage	30
TR1	Hog In feed Conveyor	30
TR2	Bark Conveyor System	30
TR3	Hog Out feed Conveyor	30
TR4	Bark Screen Oversize	30
TR5	Deck Trash Conveyor	30
TR6	Truck Bark Bin Conveyor	30
TR7	Boiler Bark Conveyor	30
TR8	Sawdust Conveyor - Vibrator	30
TR9	Chip Oversize Conveyor	30
TR10	Main Fuel Conveyor	30
TR11	Auxiliary Fuel Bin Conveyor	30
TR12	Flyash Transport	30
P1	Sawmill	30
P2	Small Log Debarker	30
P3	Large Log Debarker	30

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Emissions Unit Group 6 – Insignificant Activities

Emissions Unit	Description	Insignificant Activities IDAPA Citation Section 317.01(b)(1)
P4	Bark Hog	30
P5	Bark Screen	30
P8	Chip Screen	30
P9	Planing Mill – New	30
P10	Planing Mill – Old	30
S1	20,000 Gallon Diesel Fuel Tank	(30)
S2	20,000 Gallon Diesel Fuel Tank	(30)
S3	20,000 Gallon Gasoline Tank	(30)
S4	2,500 Gallon Diesel Fuel Tank	(30)
S5	1,000 Gallon Stove Oil Tank	(30)
S6	30 Gallon Parts Washer	(2)
S7	30 Gallon Parts Washer	(2)
S8	30 Gallon Parts Washer	(2)
S9	2,000 Gallon Aviation Gas Storage	(30)
S10	1,000 Gallon Used Oil Tank	(30)
ST8	2,000 Cubic Yd. Rock Storage	(30)

- 7.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emissions units or activities beyond those required in Part 1 (Facility-wide Conditions) of this permit.

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Compliance Schedule**8. COMPLIANCE SCHEDULE**

The following compliance schedule will be implemented by the permittee and DEQ to bring the facility into compliance with applicable Permit to Construct requirements specified in IDAPA 58.01.01.200-223.

Permit Condition	Milestone	Deadline	Documentation/Reporting
8.1	Permittee shall submit a Tier II Operating Permit application	June 30, 2001	
8.2	Permittee shall submit information requested by DEQ	Thirty (30) days after receipt of request	Submission of requested information and issuance of completeness letter from DEQ to permittee
8.3	Obtain a Tier II Operating Permit	By November 30, 2001, or a later date as determined by DEQ	Issuance of Tier II Operating Permit
8.4	Obtain a revised Tier I Operating Permit	Within nine (9) months after issuance of the Tier II Operating Permit	Issuance of revised Tier I Operating Permit

- 8.1 The permittee shall submit a Tier II Operating Permit application no later than June 30, 2001, unless a later date is approved or specified in writing by DEQ.
[IDAPA 58.01.01.322.10, 11/13/98]
- 8.2 The permittee shall submit all additional information requested by DEQ for issuance of a Tier II Operating Permit within thirty (30) days after receipt of DEQ's request, unless a longer time is approved in writing by DEQ.
[IDAPA 58.01.01.322.10.a.i; 4/5/00]
- 8.3 The permittee shall obtain a Tier II Operating Permit from DEQ by November 30, 2001, unless a later date is approved or specified in writing by DEQ. The Tier II Operating Permit will establish enforceable emission limits and permit provisions to demonstrate compliance with applicable Permit to Construct regulations of IDAPA 58.01.01.200 through IDAPA 58.01.01.223.
[IDAPA 58.01.01.322.10.a.i; 4/5/00]
- 8.4 The permittee shall obtain a modified Tier I Operating Permit within nine (9) months after issuance of the Tier II Operating Permit, unless a different time period is specified in writing by DEQ. The Tier I Operating Permit shall be modified to incorporate the provisions of the Tier II Operating Permit.
[IDAPA 58.01.01.322.10.a.i; 4/5/00]
- 8.5 The Tier II Operating Permit shall be used to define the facility-wide operating terms and conditions when sources were constructed or modified without a permit to construct. The operating permit compliance schedule is supplemental to, and does not sanction noncompliance with, the underlying permit to construct requirements that will be included in the Tier II permit.
[IDAPA 58.01.01.322.10.a.v; 5/1/94]

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General Provisions

9. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

- 9.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a; 40 CFR § 70.6(a)(6)(i)]
- 9.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b; 40 CFR § 70.6(a)(6)(ii)]
- 9.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01; 40 CFR § 70.5(b)]

Reopening

- 9.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c; IDAPA 58.01.01.386; 40 CFR 70.7(f)(1) and (2); 40 CFR § 70.6(a)(6)(iii)]
- 9.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d; 40 CFR § 70.6(a)(6)(iii)]

Property Rights

- 9.6 This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e; 40 CFR § 70.6(a)(6)(iv)]

Information Requests

- 9.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code § 39-108; IDAPA 58.01.01.122 and 322.15.f; 40 CFR § 70.6(a)(6)(v)]
- 9.8 Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g; IDAPA 58.01.01.128; 40 CFR § 70.6(a)(6)(v)]

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General Provisions

Severability

- 9.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h; 40 CFR § 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

- 9.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200 through 223; IDAPA 58.01.01.322.15.i; IDAPA 58.01.01.380 through 386; 40 CFR § 70.4(b)(12), (14) and (15), and § 70.7(d) and (e), Section 213 is a state-only requirement, but has been submitted to EPA for federal approval.]

- 9.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 USC Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) charges are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381 through 385; IDAPA 58.01.01.209.05; 40 CFR § 70.4(b)(14) and (15)]

Federal and State Enforceability

- 9.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j; 40 CFR § 70.6(b)(1) and (2)]

- 9.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code § 39-108; IDAPA 58.01.01.322.15.k]

Inspection and Entry

- 9.14 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i; 40 CFR § 70.6(c)(2)]

New Requirements During Permit Term

- 9.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.10.a.ii; 40 CFR § 70.6(c)(3) citing § 70.5(c)(8)]

Fees

- 9.16 The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n; 40 CFR § 70.6(a)(7)]

Certification

- 9.17 All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o; 40 CFR § 70.6(a)(3)(iii)(A); 40 CFR § 70.5(d)]

Renewal

- 9.18 a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six (6) months before, but no earlier than eighteen (18) months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine (9) months prior to the date of expiration.

[IDAPA 58.01.01.313.03; 40 CFR § 70.5(a)(1)(iii)]

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p; 40 CFR § 70.7(b)]

Permit Shield

- 9.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

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- c. Nothing in this permit shall alter or affect the following:
- i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code § 39-108 and IDAPA 58.01.01.122.
- [Idaho Code § 39-108 and 112; IDAPA 58.01.01.122; IDAPA 58.01.01.322.15.m; IDAPA 58.01.01.325; IDAPA 58.01.01.381.04; IDAPA 58.01.01.382.04; IDAPA 58.01.01.383.05; IDAPA 58.01.01.384.03; IDAPA 58.01.01.385.03; 40 CFR § 70.6(f)]

Compliance Schedule and Progress Reports

- 9.20 a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
- [IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.9&.10; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 9.21 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- a. Compliance certifications for all emissions units shall be submitted annually beginning twelve (12) months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ;
 - b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

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- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as DEQ may require to determine the compliance status of the source.
- d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900, 54946 (October 22, 1997); 40 CFR § 70.6(c)(5)(iv)]

False Statements

- 9.22 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125]

No Tampering

- 9.23 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126]

Semi-Annual Monitoring Reports

- 9.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six (6) months starting six (6) months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q and 322.08.c; 40 CFR § 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

- 9.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q; IDAPA 58.01.01.135; 40 CFR § 70.6(a)(3)(iii)]

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General Provisions

Permit Revision Not Required

- 9.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b; 40 CFR § 70.6(a)(8)]

Emergency

- 9.27 In accordance with IDAPA 58.01.01.332, an "Emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01; 40 CFR § 70.6(g)]

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